EASTERN RESEARCH GROUP, INC.

MEMORANDUM

TO: Rick Crume, U.S. Environmental Protection Agency (EPA),
Office of Air Quality Planning Standards (OAQPS), (MD-13)

FROM: Chris Sarsony, Eastern Research Group (ERG), Morrisville

DATE: August 20, 1998

SUBJECT: Summary of the May 28, 1998 Meeting of the Industrial Combustion Coordinated Rulemaking (ICCR) Incinerator Work Group (IWG)

1.0 INTRODUCTION

- The primary objective of the meeting was to make progress on the finalization of the Regulatory Alternatives Paper (RAP) for presentation at the July Coordinating Committee (CC) meeting and to respond to CC comments on the draft RAP, preliminary test requests, and Section 112 Recommendations. Other objectives included identifying any fuel or waste materials for addition to the Boiler Workgroup's testing program, finalizing test requests for the initial set of subcategories, and preparing the preliminary test requests for the remaining subcategories. A complete meeting agenda is included as attachment 1.
- The meeting was held on May 28, 1998 in Durham, North Carolina.
- A list of meeting attendees with their affiliations is included as attachment 2.

2.0 SUMMARY OF DISCUSSION AND DECISIONS

The meeting discussion generally followed the agenda. Topics of conversation are summarized in the following sections:

2.1 IWG Announcements and Updates
2.2 Changes Made to the RAP
2.3 Coordinating Committee Comments on the RAP
2.4 Subteam Progress Reports
2.5 Support Group Reports
2.6 Action Items

2.1 IWG Announcements and Updates

- Linda Cooper of Eastern Research Group provided an update on the arrangements for the July 7 IWG meeting at the Pittsburgh airport. She reported that a small block of rooms has been reserved at the Holiday Inn at the Pittsburgh airport in case some of the IWG members might be staying over night. Ms. Cooper stated that there is a free shuttle from the hotel to the airport and provided a handout detailing the hotel information as well as how to get to the conference rooms (attachment 3).

- Rick Crume pointed out that the information for the July CC meeting is posted on the TTN.

- Rick Crume reminded the IWG that the ICCR FACA charter expires on September 6, 1998. The EPA is currently evaluating whether, or in what form, to continue the ICCR FACA. A survey of members will be complete within a few weeks, and the decision on whether to renew the FACA will be made before the July CC meeting. Also factoring into EPA's decision will be an evaluation of the costs, productivity of the process, and the number of other FACA charters that EPA currently has ongoing (EPA is limited to approximately 20 simultaneous FACA Charters). Rick Crume noted that work performed by the workgroup must be forwarded through the CC before EPA can consider it, and the workgroup agreed to the concept of forwarding all relevant work along with the RAP.

  Ruth Mahr pointed out that EPA should consider the cost of switching from the FACA process to a traditional rulemaking process when evaluating the costs and benefits of the FACA Charter. In addition, she pointed out that rule development is not a linear process. Much of the data have been slow in coming and there could be a surge in activity when the data become available.

  Scott Warner of Eastern Research Group stated that he would like to schedule times at which he can call IWG members to get their thoughts on whether the ICCR FACA Charter should continue or not. Several IWG members wanted clarification on whether the responses provided in the phone calls would be confidential. Mr. Warner stated that they are making written notes of the conversations, but they will not be turning the notes over to EPA. They will be giving a verbal report to EPA. However, if EPA asks who made which comment they will tell EPA. Dick Van Frank stated that the ground rules Mr. Warner described were different than those that were conveyed to him by another interviewer. He stated that he was told the conversations would be confidential, and he would not have provided comments if he knew that they would not be confidential. Mr. Warner later confirmed that the ground rules he described were the correct ones.

- Rick Crume pointed out that the dioxin emission inventory has been posted on the Internet. He stated that EPA has ordered a CD-ROM with the raw data for each of the subteams.

- Rick Crume gave an update on the estimates of costs for conducting emissions tests. He stated that a model for calculating the costs has been posted on the Internet, and also he

has talked with a member of the testing and monitoring protocol workgroup about ICCR testing costs. For an emissions test before and after the control device (3 runs, includes dioxin), the cost can be around $150 thousand per facility for all of the Section 129 pollutants. This is significantly higher than the $50 to $60 thousand estimate that was being used previously. He stated that according to Fred Porter's announcement at the previous CC meeting, there is approximately $1 million left in the testing budget for ICCR in FY98, and about $2.5 million remain in the total ICCR testing budget. In summary, he said that the emissions tests are expensive and the resources are limited. Norman Morrow stated that the IWG needs to layout more details of the emission tests that are needed so that EPA can make an accurate assessment of the costs.

- Rick Crume gave an update on the status of the test report requests. Over 180 reports have been requested by all the work groups. About 90 of these test reports have been received. Of those received, 45 to 50 have been reviewed. Most of the reports reviewed thus far are good test reports. So far only a few incineration units have been identified, most of which have been municipal solid waste incinerators.

  Several IWG members pointed out that the operating and feed conditions under which the emissions tests are conducted must be considered when developing standards. Norman Morrow pointed out that MACT standards are typically developed based on performance tests conducted at maximum recommended operating conditions. Mr. Morrow stated that this rule should also be based on emissions data obtained at maximum operating conditions. He pointed out that we could develop separate standards for startup, shutdown, and malfunction.

- Tom Waddell gave the following update on the databases:

  Inventory database - ERG is currently developing Version 4 and should be releasing it in mid to late July. This version will include DOD sources and data from AMSA.

  Survey database - Version 3 will be released on June 21. By the end of July, EPA will release the whole database. There are still 870 surveys without a response.

  Some IWG members indicated that they would like to get an idea of how much more data might be coming in for incinerators, especially for the second mailing of the surveys. Tom Waddell indicated that ERG would see if they could provide that information. Some IWG members stated that it would be good if the IWG could get the new information separate from the existing information, so that they can quickly identify what has been added to the database.

- Rick Crume mentioned that Dick Brown, a city Manager, wants to join the workgroup to represent the interests of small government.

2.2 Changes Made to the RAP

- Rick Crume walked through the changes that were made to version 1 of the RAP to generate version 2. Specifically, the following changes were made:

    1. The introductory language was changed by adding more qualifier information.

    2. The pollution prevention section was modified to include the CC's recommendations.

    3. The background information was expanded and some figures were added.

    4. The children's health section was clarified. Because MACT standards are technology based, children's health cannot be considered explicitly to determine the MACT floor for the regulation. However, children's health can be considered in other ways.

    5. Editorial improvements were made.

    6. No changes were made to the attachments.

    Rick asked that the IWG send any comments on Version 2 of the RAP to him by June 5. He will send a revised draft out to the IWG on June 12. On June 18 at 11:00 there will be a teleconference call to discuss any remaining RAP issues.

    Dick Van Frank stated that the following questions still needed answers:

    1. How much waste per hour is going into the incinerators, and what is the waste mix?

    2. What is the definition of solid waste?

    3. Will waste burning boilers be covered under ICWI/OSWI?

    4. Small MWC's are not addressed in the RAP. Where do they fall? Rick Crume indicated that the small MWC's fall under OSWI, but are being handled outside of the ICCR FACA.

    David Marrack indicated that the RAP should contain a more detailed discussion of children's health, possibly as an attachment, even if it is not considered in the rule. Dick Van Frank agreed that this issue needs to be recognized.

    Jeff Shumaker stated that the pollution prevention section of the RAP might be too long relative to other sections of the RAP. He was concerned about over elaborating issues in the RAP. Dick Van Frank pointed out that the purpose of the RAP was to discuss

regulatory alternatives such as pollution prevention techniques. The workgroup decided to give some more thought on the balance of the discussions in the RAP.

2.3 Coordinating Committee Comments on the RAP

- Norman Morrow presented the CC comments on the RAP. He stated that on the whole the CC felt that the RAP was a good report. The 112 recommendations were presented to the CC without comment. The comments that the CC had on the RAP were generally editorial in nature. The CC was concerned about the completeness of the ICWI/OSWI database. The CC requested that the IWG check the database to ensure that some units have not been left out and to report the results to the CC by the July 28 meeting. Mr. Crume indicated that at the last CC meeting there were also questions as to how metals and certain metals facilities would be addressed in ICWI/OSWI.

2.4 Subteam Progress Reports

- Subteam 1 reported that they are currently reviewing state incinerator regulations and trying to get state incinerator population data to help set MACT floors. They have not found any good estimates for the number of chicken burners. In addition, they are considering subcategorizing the units into the following two unit design types:

  1. Multi chamber - there are no shared walls.

  2. Retort type - one chamber is on top of the other, there is good fluid control in this type.

  Rick Crume pointed out that there probably is not enough money to conduct all 14 of the tests that subteam 1 recommended previously. He stated that subteam 1 needs to prioritize their emissions tests.

  Subteam 1 stated that the emission test request they proposed previously was viewed as their minimum testing requirements. However, there are some test reports available that may provide some additional information (Rick Crume reported that 2 crematory and 3 animal incinerator test reports were received as part of the latest effort.). Subteam 1 stated that they would like to see the test reports as soon as possible. Rick Crume stated that there is a meeting later in the week to discuss the best way to get test report information to the workgroups. Subteam 1 also indicated that the dioxin report will provide additional information. One of their biggest challenges at this point is finding out what combustion parameters control the emissions.

  Ethan Begg suggested that subteam 1 contact the American Poultry Producers Association for a better breakdown of how many chickens are burned and where. He also suggested contacting Missouri and California, both of which require permits for chicken incinerators. The permits should contain at least particulate tests and stack tests. He offered to get a list of manufacturers that are doing tests on chicken burners. Beth Berglund pointed out that there should be accurate test data for chicken burners in the

States of New Hampshire, North Carolina, West Virginia, Missouri and Arkansas. Dale Walter indicated that subteam 1 does have some data on chicken burners but it is only particulate data.

Subteam 1 asked, if the emissions profile for their sources was similar to that for medical waste incinerators, could they be addressed under the medical waste incinerator rule? Rick Crume stated that it could be a possibility, but they would need a rationale.

Subteam 1 reported that they do not have any wastes to add to the boiler workgroup's testing program.

- Subteam 2 has been working on the database and turfing issues. They currently have approximately 100 units in the following two subcategories:

    1. Miscellaneous hydrocarbon wastes - waste oil, carbon black, water streams, recovered methanol products, explosives, etc. Some are halogenated and some have sulfur, which they still need to address. They are currently assuming that all of these wastes combust similarly. Approximately 80 percent of the units in their subteam fall into this subcategory. Their plan is to start looking at controls and emissions data. They are also doing some follow-up. By July they hope to have all the data for these units.

    2. Industrial wastewater sludge - They are not sure whether these fit into subcategory 1. For now they are considering this to be a separate subcategory. They are going to try to follow-up with some of the companies to get more detailed information. They plan to complete the follow-up by July.

    Subteam 2 has scheduled a meeting on June 24, 1998 in Chicago.

    Subteam 2 has determined that sufficient data exists from permit limits, state rules, the dioxin report, and existing test data; therefore, they will not request emission tests. The subteam stated that they would like to get copies of the basis documents for the municipal waste and the medical waste rules. Most of their wastes are already on the list of fuels/wastes for the boiler testing program; therefore, they have nothing new to add to the list. Subteam 2 indicated that there are some turfing questions related to the burning of laminates and laminates on wood.

- Subteam 3 has identified 4 different types of units:

    1. Open burning

    2. Air curtain incinerators

    3. Tepee burners

    4. "True" incinerators (approximately 30-60, probably closer to 30)

Their phone calls to facilities have yielded the following results:

1. There are fewer true incinerators than they originally thought.

2. There are more tepee and air curtain incinerators than they originally thought.

3. There are no controls on these units - therefore the floor would be no control.

Subteam3 identified the following issues:

1. How to deal with low technology burning (such as tepee burners)?

2. Some of the categories have a small number of units. They could consider some novel solutions. Would no regulation be an option?

If finishing wastes are incinerated they may be added as another subcategory.

They have not discussed regulatory alternatives above the floor but have identified the following options:

- Good combustion practices
- Source separation
- Particulate matter control
- Scrubbers, ESP's
- Afterburners

Test data are lacking, and they are hoping that the test reports will provide the emissions data that they need. If test data are not found from other sources, and money is not available to conduct emission tests they would set the standard based on state limits and permit data. If money is available, they would request the following emission tests:

- Test one unit under three scenarios: milled, harvested, and treated.
- Conduct three tests per waste, three runs each.
- The tests would be confined to the Section 129 pollutants, and they may not need data on particulates.

Subteam 3 will submit a copy of their test request and a copy of their comments on the pollution prevention section of the RAP.

Larry Thompson asked how air curtain incinerators could be excluded from ICWI/OSWI when they can be used for pathological wastes? Subteam 3 clarified that the exemption applied only to air curtain incinerators that incinerate wood waste, yard waste, and lumber. One IWG member pointed out that they needed to be careful that they did not create an incentive for facilities to switch to air curtain incinerators.

Dr. Marrack stated that they probably will not get much information from the States and that they need to test for PAHs. Dr. Marrack also asked why the wood is burned rather than being chipped or combusted? It seems to be a good area to apply pollution prevention practices. Beth Berglund said that they could discuss this issue in the pollution prevention workgroup.

- Subteam 4 is rewriting their subcategory definition sheets for metal parts reclaimers (attachment 4). They have found that this is not a homogeneous subcategory. They have identified the following three groups of metal parts reclaimers:

  1. Transformer cores, electric motor cores (electric winding reclaimers)

  2. Paint racks/hooks

  3. Electroplating racks

  Subteam 4 asked whether they should develop separate data sheets for the three groups of metal parts reclaimers or keep them on one sheet. Rick Crume stated that they should provide the detail but keep them all on one sheet.

  Subteam 4 summarized the data available for these three groups and their testing needs (attachment 4). For electric winding reclaimers, they did not recommend testing. For paint racks/hooks reclaimers, subteam 4 did not request any emissions testing but did request that dried paint samples be added to the Boiler Workgroup's list of wastes. For the electroplating racks, subteam 4 recommended stack testing for all section 129 pollutants at two representative PVC burn off units. Including the testing requests for drum reclaimers, subteam 4 is requesting a total of 4 stack tests and 6 materials to be added to the boiler list of wastes for constituent analysis. The test requests for subteam 4 were given to Rick Crume on disk.

  Subteam 4 requested the test reports for the following facilities: G&S Motor, Bickford, Inc, and Kopacz Industrial Painting, Inc.

  Dick Van Frank asked whether there were any substitutes for the PVC in the electroplating racks. Andy Roth stated that there currently were no substitutes. Dr. Marrack stated that they should also be looking at PCB emissions from the PVC.

2.5 Support Group Reports

- Beth Berglund reported that the Pollution Prevention subgroup is looking at fuel waste constituent standards. She described this as using waste or fuel constituent sampling instead of stack testing to determine compliance with the rule. Jeff Shumaker asked how that fit into the pollution prevention concept. Norm Morrow answered that the idea is that you make the rule a little harder to achieve and in turn allow an alternative compliance demonstration approach.

2.6 Where Do We Go From Here?

- Rick Crume discussed some suggestions for completing the RAP. He presented the following information on an overhead transparency:

  - List of facilities/units
  - Waste definitions (%'s and averaging times)
  - More groupings or subcategories?
  - Address new and existing units
  - Nationwide population estimates
  - Any additional pollutants?
  - Feed rates, mode of operation, etc.
  - Floors and control options
  - Emission data summary
  - Concerns/issues/needs

  Mr. Crume's main point from the presentation was that we need, as much as possible, to address the remaining gaps in the RAP, using information currently available to us. He stated that it is to our advantage to put as much detail in the RAP as possible. The floors and the control options are especially important, and it would be helpful to see a summary of available (or expected to be available) emissions data. For some sources the floor may be no control. Also, for some sources there may not be any add-on control. He stressed that the IWG needs to put any ideas they may have on control options into the RAP. Additionally, the sooner we can prepare a list of facilities and units, the sooner the economists can get started on the impacts analysis. He also made the point that we should address new units as well as existing ones. For the emission data summary, the subteams should put in a summary of the emission test reports that are available and

which ones are good and which ones are not. He pointed out that there could be a common mercury or lead limit for all subcategories.

Several IWG members wanted to explore the possibility of setting surrogate limits for pollutants. One example was to use PM as a surrogate for emissions. The workgroup members requested that EPA find out whether the use of surrogate limits is an option for ICWI/OSWI.

One workgroup member asked how they could get access to compilations of state rule requirements. Rick Crume answered that ERG had prepared a memorandum on state requirements and that the memorandum was posted on the Internet for the November meeting. Jeff Shumaker requested a copy of the report.

2.6 Action Items

- Rick Crume will send each subteam leader a CD containing the dioxin emissions inventory.

- IWG members will forward comments on the RAP to Rick Crume by June 5. Rick Crume will post or distribute a revised version by June 12.

- Rick Crume will check into getting statistics on the second ICR mail out responses.

- Jon Devine will explore the option of being able to use surrogates to set emission limits under Section 129 of the Act.

3.0 CALENDAR OF EVENTS

June 5	-	Deadline for submittal of comments on RAP V2 to Rick Crume
June 12	-	RAP V2R1 will be posted for IWG review
June 18	-	Conference call to discuss RAP v2r1
June 26	-	RAP v2r2 posted for IWG review
July 7	-	Workgroup meeting in Pittsburgh
July 13	-	Final RAP sections due
July 17	-	RAP v2r3 posted for CC review
July 28-29	-	CC Meeting at Long Beach, CA
August 4	-	Conference call to set up next meeting. (10:00 EST)

ICCR INCINERATOR WORK GROUP MEETING
May 28, 1998
Regal Hotel, Durham, NC

Activities and Decisions

- Rick Crume reminded the Incinerator Work Group (IWG)that EPA is evaluating whether, or in what form, to continue the ICCR FACA. A survey of members will be complete within a few weeks, and the decision will be made before the July Coordinating Committee (CC) meeting. Work done by the Work Groups must be forwarded to the CC for EPA to be able to use it in rulemaking. If the ICCR FACA ends, there should be a final meeting to submit Work Group recommendations to the CC.

- Rick Crume summarized progress on efforts to obtain and evaluate test reports requested from ICR respondents. Of 180 reports requested, approximately half have been received. 45-50 have been reviewed to date, and most were determined to be useful reports.

- Rick Crume provided an overview of the latest revisions to the RAP, including addition of a pollution prevention section, expansion of background information, and clarification on the executive order on children's health. Work Group members should forward their comments to Rick Crume by June 5. A teleconference to discuss the comments is tentatively scheduled for June 18.

- Subteam 2 has a database of about 100 units that fall into two subcategories--miscellaneous hydrocarbon wastes, which comprises most of the incinerators in the database, and industrial wastewater sludge. The subteam will work with EPA and ERG to better define subcategorization, emissions, and controls by the July IWG meeting. Subteam 2 does not expect to request emission testing at this point, because sufficient data seem to be available from permit limits, state rules, and existing test data.

- Subteam 4 identified three groupings within the metal parts reclaimer subcategory--electric wire reclaimers, non-PVC coated metal parts recovery units, and plastisol/PVC burn off ovens. The subteam is recommending coating materials analysis for non-PVC coated metal parts recovery units prior to emission

testing. They also recommend stack testing for all Section 129 pollutants for the PVC burn off units. Data are currently available for electric wire reclaimers.

- Subteam 3 has identified four combustion groups--open burning, air curtain incinerators, teepee burners, and "true" incinerators. There are about 30 "true" incinerators. No controls have been identified, so the MACT floor might be no control for those units. If incinerators for finishing materials are identified, they could become another subcategory. The subteam recommends emission testing for three different waste types in their subcategory under three operating conditions.

- Subteam 1 is looking at state regulations and trying to get state incinerator population data to help set MACT floors. Subteam 1 units fall under two designs--retort and multi-chamber--and they may need to be considered separately with respect to operation conditions. The subteam is reevaluating its emission testing request given test budget constraints and potential availability of other data.

- Other than Subteam 4's request, the IWG will not add to the Boiler Work Group's fuel/waste testing program. Any requests should be sent to Rick Crume within the next two working days.

- Rick Crume presented a list of suggestions on items needed to complete the RAP. The list will be attached to the complete version of the minutes.

Upcoming Meetings

- The current Work Group meeting schedule is as follows:

  - July 7: Incinerator Work Group meeting at the Pittsburgh airport.

  - June 18: tentative Incinerator Work Group Conference Call, 11:00 a.m. EDT.
    (Note: This teleconference was subsequently rescheduled from June 18 to June 19.)

  - August 4: Incinerator Work Group Teleconference, 10:00 a.m. EDT

Action Items

- Rick Crume will send each subteam leader a CD containing the dioxin emission inventory.

- IWG members will forward comments on the RAP to Rick Crume by June 5. Rick Crume will post or distribute a revised version by June 12.

- Rick Crume will check into getting statistics on the second ICR mail out responses.

- Jon Devine will explore the option of being able to use surrogates to set emission limits under Section 129.

Attachment 1

Final Agenda
ICCR Incinerator Work Group

AGENDA
INCINERATOR WORK GROUP MEETING

May 27-28, 1998 8:30 am to 4:00 pm
Regal University Hotel
Durham, North Carolina

MEETING OBJECTIVES

Respond to Coordinating Committee (CC) comments on the draft Regulatory Alternatives Paper (RAP), preliminary test requests, and Section 112 recommendations.

Make progress towards finalizing the RAP for presentation at the July CC meeting.

Finalize test requests for initial set of subcategories and prepare preliminary test requests for remaining subcategories.

Note: Subteams will meet individually on May 27 and will set their own agendas and time schedules. (Separate meeting rooms for the subteams will be available from 8 am to 5 pm.) The entire work group will meet together on May 28.

AGENDA

May 27:

Subteams to set their own agendas and time schedules

May 28:

8:30 am Call to order and welcome -- *Rick Crume*
Approval of agenda -- *Scott Warner*
Review of meeting objectives -- *Norm Morrow*

8:40 am Announcements and updates -- *Rick Crume*

9:00 am Review of Coordinating Committee comments on work group presentations -- *Norm Morrow*

9:15 am Subteam #1 status report and discussion -- *Paul Rahill*

9:45 am Subteam #2 status report and discussion -- *Bob Morris*

10:15 am BREAK

10:30 am Subteam #3 status report and discussion -- *Dave Maddox*

11:00 am Subteam #4 status report and discussion -- *Andy Roth*

11:30 am LUNCH / SUBTEAM MEETINGS

1:00 pm Updates and support group reports

Pollution prevention -- Beth Berglund
Boiler and process heater work group coordination -- *Norm Morrow and Rick Crume*
Database update -- *Tom Waddell*

1:30 pm Subteam follow-up and discussion of test requests

2:30 pm BREAK

2:45 pm Where do we go from here -- *Rick Crume*

3:30 pm Progress needed for next meeting -- *Norm Morrow*

3:45 pm Wrap-up

Scheduling of future meetings/teleconferences — *Norm Morrow*
Other business -- *Group*
Flash minutes -- *Susan Radomski*

4:00 pm Adjourn -- *Rick Crume*

Attachment 2

Meeting Participants

Meeting Participants

Name	Affiliation
Ethan Begg	Missouri Department of Natural Resources
Beth Berglund	Merck & Co, Inc.
Richard Crume	U.S. EPA/OAQPS
Jon Devine	U.S. EPA/OGC
John Enneking	Batesville Casket Company
Doug Finan	Glaxo Wellcome, Inc.
Ruth Mahr	Citizens Concerned about Medical Waste Incineration
David Marrack	Galveston-Houston Assoc. for Smog Prevention
Dennis Marietta	La-Z-Boy Incorporated
Norman Morrow	Exxon Chemical Americas
Bill Perdue	Pulaski Furniture Corporation
Andrew Roth	Regional Air Pollution Control Agency (Ohio)
Glenn Sappie	NCENR-DAQ
Chris Sarsony	Eastern Research Group, Inc.
Jeff Shumaker	International Paper
Larry Thompson	AUMA/AAULD
Dick Van Frank	National Audubon Society
Tom Waddell	Eastern Research Group, Inc.
Dale Walter	Industrial Equipment and Engineering Company
Scott Warner	Eastern Research Group, Inc.
Bill Wiley	Consumat Systems, Inc.
Dana Worcester	Association of Container Reconditioners

Attachment 3

Information for the July 7, 1998
IWG Meeting in Pittsburg

EPA INDUSTRIAL COMBUSTION COORDINATED RULEMAKING
INCINERATOR WORK GROUP FLY-IN MEETING

Date	Tuesday, July 7, 1998
Place	Pittsburgh International Airport Conference Room A, Pittsburgh, PA
Accommodations	A block of rooms is reserved at the Holiday Inn-Pittsburgh Airport at $75.95 + 14% tax if reservations are received **by or before June 19, 1998**, by calling (800) 333-4835 or (412) 262-3600 both direct to the hotel. To receive this rate, you must identify yourself by the group name "EPA Incinerator Meeting" and must guarantee the reservation with a valid credit card number or a deposit. After June 19, the special rate for rooms is subject to availability. Check in is at 3 p.m.; check out is at noon. Reservations can be canceled up to 4 p.m. on the day of arrival with no penalty.
Meals	None are provided. The airport terminal has restaurants as does the Holiday Inn-Pittsburgh Airport, and other options are available within driving distance.
Local Transportation	The Holiday Inn-Pittsburgh Airport offers a complimentary shuttle to and from Pittsburgh International Airport. Use the courtesy phones in the baggage claim area of the airport terminals to request the shuttle. Taxis and rental cars are also available at the airport.
Parking	Complimentary at the hotel for overnight and day guests. There is a fee for parking at the airport.
Messages	Messages to guests at the Holiday Inn-Pittsburgh Airport can be relayed by calling (412) 262-3600. Hotel guests will be notified by the message light on their telephone. Only for emergencies or truly urgent messages should callers phone (412) 472-5540 and specify that their message be delivered to the EPA ICCR meeting in Conference Room A.
Directions	*From airplane arrival gates to the conference room*: Proceed to the core of the air side terminal and take the escalators to the trains. Take the train to the land side terminal (only one stop). Depart the train and pass by security. On the left side is a National City Bank and a set of escalators, with a hallway between these. Proceed down the hallway to the elevator and go to the 4th floor. Upon exiting the elevator at the 4th floor mezzanine, Conference Room A is to your immediate right. *From entrance of the airport terminal (Commercial Curb via hotel courtesy shuttle)*: Have the driver stop at the middle set of doors and enter the terminal on the ticketing level. On the right side is an elevator. Take the elevator to the 4th floor. Upon exiting the elevator at the 4th floor mezzanine, Conference Room A is to your immediate right.

Attachment 4

Testing Requirements for Metal Parts Reclaimers

Testing 1...2...3...

Incinerator Work Group subteam #4
May 28, 1998

Metal Parts Reclaimers

What kinds of metals parts are reclaimed?

* transformer cores, electric motor cores
* paint racks/hooks
* electroplating racks

What test data exist?
Do we need to test them all?
Why or why not?

According to SURVEYV2.MDB, test data exist for transformer/electric motor core burnoff ovens:

550570416 Bickford, Inc.
Bayco burnoff oven with direct flame afterburner
Natural gas
CO, HCl, PCBs

34017W091 G&S Motor
Burnoff oven with direct flame afterburner and high temperature fabric filter
Natural gas
Cd, CO, dioxins, HCl, Pb, Hg, NOx, TSP, SO2, VOC, PCBs

Section 129 pollutants (and PCBs) emissions data exist for transformer reclaimers!

According to SURVEYV2.MDB, test data exist for paint rack burnoff ovens:

170970004 Transcend Corp.
Burnoff oven with direct flame afterburner
Natural gas
CO, NOx, TSP, SO2, VOC

261630214 Kopacz Industrial Painting, Inc.
Burnoff oven with direct flame afterburner
Natural gas
CO, TSP, SO2, VOC

For these type of units, test data do not exist for all Section 129 pollutants!

What types of materials comprise cured paint?

- urethanes $CO(NH_2)OC_2H_5$
- acrylics $H_2C{:}CHCOOH$
- epoxies -OCHCHOCH-
- pigments, chlorine?

VERY SMALL AMOUNTS OF PAINT (pounds per day)

According to SURVEYV2.MDB, test data do not exist for electroplating rack burnoff ovens:

In fact, I have found only one survey respondent who may burn off plastisol (PVC with plasticizer) and only returned Part I of the Combustion Unit Survey Form. That means: no combustion unit description, no test data, no APCD information, no NOTHING!!

Is this a big deal? MAYBE

* PVC is 57% by weight chlorine
* Afterburners provide no acid gas control
* Published ambient dioxin data suggest that PVC burnoff ovens contribute to ambient dioxin levels.

Chemosphere, 19, 541-546, (1989)
Environmental Engineering Science, Vol. 15, no. 2 (in publication)

PCDD/PCDF concentration at impacted site when PVC burnoff oven in operation: 0.36 pgTEQ/m^3 (1 24-h sample)

PCDD/PCDF concentration at impacted site when PVC burnoff oven is not in operation: 0.17 pgTEQ/m^3 (avg of 5 24-h samples)

SUMMARY

Subsubcategorize metals parts reclaimers into 3 groups:

Electric winding reclaimers (population ~300)
Paint racks/hooks reclaimers (population ~1000)
Plastisol/PVC burnoff ovens (population ~50)

Electric winding reclaimers have test data for all Section 129 pollutants. Subteam #4 recommends low priority for additional testing pending review of test reports.

Paint racks/hooks reclaimers have test data for some Section 129 pollutants. Based on amount and type of materials combusted, subteam #4 recommends analysis of dried coatings for metals/chlorine in lieu of additional stack testing pending review of test reports.

Plastisol/PVC burnoff ovens have very little or no test data for Section 129 pollutants. Based on the material combusted, subteam #4 recommends stack testing for all Section 129 pollutants at two representative PVC burnoff units.